

Exhibit B

Chris Springer

From: Chris Springer
Sent: Thursday, December 23, 2021 11:56 AM
To: Swanson, Alexander; Matt Melamed; Derek Loeser; Lesley Weaver; Anne Davis; Cari Laufenberg; David Ko
Cc: Stein, Deborah L.; Falconer, Russ; Kutscher Clark, Martie; Buongiorno, Matt; Mumm, Laura C.
Subject: RE: Facebook MDL - proposed stip re RFPs
Categories: Green Category, Yellow Category

Alex,

I write to follow up with respect to the draft stipulation of voluntary dismissal for Samuel Armstrong that we provided for Facebook's review earlier this month. This stipulation follows form with respect to the stipulations of withdrawal to which Facebook previously agreed. We ask that you respond as to whether Facebook will agree to this stipulation no later than Friday, January 7, 2021.

Please let us know if you have any questions or would like to schedule a call to discuss.

Thank you,
Chris

--

Chris Springer
Keller Rohrback L.L.P.
Phone: (805) 456-1496
Fax: (805) 456-1497
Email: cspringer@kellerrohrback.com

CONFIDENTIALITY NOTE: This e-mail contains information belonging to the law firm of Keller Rohrback L.L.P., which may be privileged, confidential and/or protected from disclosure. The information is intended only for the use of the individual entity named above. If you think that you have received this message in error, please e-mail the sender. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited.

From: Chris Springer
Sent: Friday, December 3, 2021 12:10 PM
To: Swanson, Alexander <ASwanson@gibsondunn.com>; Matt Melamed <mmelamed@bfalaw.com>; Derek Loeser <dloeser@KellerRohrback.com>; Lesley Weaver <lweaver@bfalaw.com>; Anne Davis <adavis@bfalaw.com>; Cari Laufenberg <claufenberg@KellerRohrback.com>; David Ko <dko@KellerRohrback.com>
Cc: Stein, Deborah L. <DStein@gibsondunn.com>; Falconer, Russ <RFalconer@gibsondunn.com>; Kutscher Clark, Martie <MKutscherClark@gibsondunn.com>; Buongiorno, Matt <MBuongiorno@gibsondunn.com>; Mumm, Laura C. <LMumm@gibsondunn.com>
Subject: RE: Facebook MDL - proposed stip re RFPs

Thank you, Alex.

We are reviewing the proposed terms of the stipulation and will let you know whether we agree to those terms.

Regarding your questions, we plan to produce responsive documents for Plaintiffs Senko and King next week in advance of Plaintiff Senko's deposition. We will provide responsive documents from other Plaintiffs on a rolling basis and will prioritize production in light of scheduled depositions. We also plan to send edits to Facebook's proposed search strings for its second set of RFPs next week as well.

Additionally, pursuant to our earlier discussion, attached is a draft stipulation of voluntary dismissal for Plaintiff Armstrong for your review. Please let us know if you have any questions or would like to schedule a call to discuss.

Best,
Chris

--

Chris Springer
Keller Rohrback L.L.P.
Phone: (805) 456-1496
Fax: (805) 456-1497
Email: cspringer@kellerrohrback.com

CONFIDENTIALITY NOTE: This e-mail contains information belonging to the law firm of Keller Rohrback L.L.P., which may be privileged, confidential and/or protected from disclosure. The information is intended only for the use of the individual entity named above. If you think that you have received this message in error, please e-mail the sender. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited.

From: Swanson, Alexander <ASwanson@gibsondunn.com>
Sent: Wednesday, December 1, 2021 5:34 PM
To: Chris Springer <cspringer@KellerRohrback.com>; Matt Melamed <mmelamed@bfalaw.com>; Derek Loeser <dloeser@KellerRohrback.com>; Lesley Weaver <lweaver@bfalaw.com>; Anne Davis <adavis@bfalaw.com>; Cari Laufenberg <claufenberg@KellerRohrback.com>; David Ko <dko@KellerRohrback.com>
Cc: Stein, Deborah L. <DStein@gibsondunn.com>; Falconer, Russ <RFalconer@gibsondunn.com>; Kutscher Clark, Martie <MKutscherClark@gibsondunn.com>; Buongiorno, Matt <MBuongiorno@gibsondunn.com>; Mumm, Laura C. <LMumm@gibsondunn.com>
Subject: Facebook MDL - proposed stip re RFPs

Chris,
Attached for Plaintiffs' consideration please find a proposed stipulation concerning Facebook RFP Nos. 3, 4, 6, 7, 8, 10, 11, 12, and 13. Please let us know if Plaintiffs will agree to these terms.

In addition, when we met and conferred on November 9, you mentioned that you were working through the search terms for Facebook's second set of RFPs and would have comments shortly. You also indicated that Plaintiffs would soon be making a document production. When can expect those? Given the upcoming depositions, time is of the essence.

Thanks,
Alex

Alexander P. Swanson

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071-3197
Tel +1 213.229.7907 • Fax +1 213.229.6907
ASwanson@gibsondunn.com • www.gibsondunn.com

This message may contain confidential and privileged information for the sole use of the intended recipient. Any review, disclosure, distribution by others or forwarding without express permission is strictly prohibited. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

Please see our website at <https://www.gibsondunn.com/> for information regarding the firm and/or our privacy policy.
